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May 8, 2020

VIA ECF AND FIRST CLASS MAIL

Hon. Gabriel W. Gorenstein
Chief U.S. Magistrate Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Courtroom 6B
New York, New York 10007-1312

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Re: *Wood v. Mike Bloomberg 2020, Inc.* (20 Civ. 2489) (LTS)(GWG)

Dear Judge Gorenstein:

We represent Defendant Mike Bloomberg 2020, Inc. (“MB2020”) in the above-referenced matter. In accordance with paragraph 2.B of the Court’s Individual Practices, we write with Plaintiffs’ consent to inform the Court that the parties have agreed to a two-week extension of the briefing schedule in connection with Plaintiffs’ Motion for Conditional Certification of a Collective and Authorization of Notice Pursuant to 29 U.S.C. § 216(b) (the “Motion for Conditional Certification”) (Docs. 63-65).

Plaintiffs filed the Motion for Conditional Certification on April 17, 2020. Pursuant to agreement between the parties, MB2020’s opposition was to be filed by May 18, 2020 and Plaintiffs’ reply by June 17, 2020.

During a meet-and-confer on May 1, 2020, Plaintiffs consented to MB2020’s request for a two-week extension of the briefing schedule. The revised briefing schedule is as follows:

- June 1, 2020 – MB2020’s opposition to the Motion for Conditional Certification.
- July 1, 2020 – Plaintiffs’ reply in further support of the Motion for Conditional Certification.

The parties further agree that MB2020 shall file a substantive opposition by June 1, 2020, but that nothing in the parties’ agreement shall waive MB2020’s right to move for a stay of the disposition of the Motion for Conditional Certification, and/or other aspects of the litigation pending resolution of a future dispositive motion, if applicable, as the Court indicated will be permitted in its April 16, 2020 Order (Doc. 62), and Plaintiffs retain the right to oppose such relief. The parties have, in accordance with paragraph 1.E of the Court’s Individual Practices, filed a stipulation indicating their agreement that Plaintiffs shall file a second amended complaint by May 18, 2020, and MB2020 shall answer, move, or otherwise respond to the second amended complaint within 30 days after Plaintiffs file it. The parties expressly reserve their rights to seek relief from the Court as appropriate, but such relief will not include MB2020 seeking leave from responding substantively to Plaintiffs’ Motion for Conditional Certification on June 1, 2020.

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We thank the Court for its attention to this matter.

Respectfully,

A handwritten signature in black ink, appearing to read "Elise M. Bloom". The signature is written in a cursive, flowing style.

Elise M. Bloom

cc: All Counsel (via ECF)